

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: JAN 06 1983

SUBJECT: Olin Water Services, Kansas City, Kansas, EPA I.D. No.: KSD000203638

FROM: Karen A. Flournoy, Permits Section, ARWM/WMBR
THRU: Lynn Harrington, Chief, PMTS
Robert Morby, Chief, WMBR*Karen A. Flournoy*

TO: Addressees

Background: Olin Water Services submitted a rulemaking petition to EPA Headquarters to revoke the requirement in 265.176 (storage of ignitable waste in drums 50 feet from the property line) for their facility. On July 9, 1982, EPA Headquarters advised KDHE that they (KDHE) could exercise appropriate enforcement discretion. On September 24, 1982, KDHE approved a variance request for one year.

Issue: On December 28, 1982, I was contacted by Olin Corporation and ask how EPA would rule on this issue in the Part B application which is due on March 13, 1983.

Summary: After discussing this issue with Regional Office and Headquarters staff, I advised the Olin Corporation on December 30, 1982, that they should provide the following information in the Part B application:

1. Discussion of why the requirement in 265.176 cannot be met.
2. Propose alternatives to meet the intent of the regulation.
3. Discuss local fire codes as applicable to storage of ignitable waste in drums.

I advised them that we would review the information and determine if a waiver can be granted. The permit application and administrative record shall be appropriately documented.

Addressees:

Jane Werholtz, CNSL
Pete Culver, AWCM ✓
Permits Section

R00011096
RCRA Records Center

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